

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
W. R. GRACE & CO., et al.¹) Case No. 01-01139 (JKF)
) (Jointly Administered)
Debtors.)
) **Hearing Date: September 13, 2010, at 10:00 a.m.**
) **Objection Deadline: August 27, 2010**

APPENDIX

to

**DEBTORS' MOTION FOR AN ORDER ENFORCING THE 2009 STIPULATION AND
ORDER AND ORDERING THE NEW JERSEY DEPARTMENT OF
ENVIRONMENTAL PROTECTION TO CEASE AND DESIST FROM FURTHER
VIOLATIONS THEREOF**

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

1. Order Approving a Stipulation with the New Jersey Department of Environmental Protection. (“2009 Stipulation and Order”, docket no. ____)
2. “*Notification Events for NJDEP and Hamilton Twp*”, as produced by USEPA (the “USEPA Chronology”)
3. Letter from George Pavlou to Jared Roberts et al. (May 29, 2002)
4. Letter from Robert A. Emmett, Esq. of Grace to Brian E. Carr, Esq., USEPA Region II (May 31, 2002)
5. Letters from counsel to Amtrak addressed to Brian E. Carr, Esq., USEPA Region II (July 24, 2002)
6. Letters from counsel to APU addressed to Brian E. Carr, Esq., USEPA Region II (July 24, 2002)
7. USEPA Action Memorandum titled “Request for a Time Critical Removal Action at the former W.R. Grace/Zonolite Site in Hamilton Township, Mercer County, New Jersey – Action Memorandum” (the “USEPA Memorandum”)
8. USEPA Initial Pollution Reports (January 30, 2004) (“POLREP I”)
9. USEPA Initial Pollution Reports (February 27, 2004) (“POLREP II”)
10. USEPA Region II Press Release, “EPA to Supervise the Removal of Approximately 6,500 Tons of Contaminated Soil from Former Vermiculite Plant” (August 28, 2006) (the “USEPA Press Release”)
11. Testimony of Dr. Marwan Sadat, Committee Meeting of Assembly Judiciary Committee and Assembly Environment and Solid Waste Committee, “*Testimony from Invited Individuals Concerning Asbestos Contamination at the Former W. R. Grace Zonolite Plant in Hamilton Township, Mercer County*” (May 10, 2005) (the “5/10/05 Assembly Committee Meeting”)
12. USEPA Region II Press Release titled “Good News from Soil Sampling Results at Hamilton’s Former Vermiculite Plant” (June 6, 2006)
13. USEPA Pollution Report No. 3 (September 10, 2007) (the “POLREP III”)
14. Letter from Michael Ferriola, On Scene Coordinator, USEPA Response & Prevention Branch, to Tom Bugey of Roux Associates Inc., (July 10, 2008) (the “7/10/08 Ferriola Letter”)
15. Letter from Charles S. Warren, Esq. to Ann Wolf, Bureau of Industrial Site Remediation, NJDEP (July 11, 2008) (the “2008 Warren Letter”)

16. Letter from Mark J. Pedersen of NJDEP to Paul J. Norris, CEO, W.R. Grace & Co.-Conn. and Charles Warren, Esq., Bryan Cave (May 3, 2005) (the "5/3/05 Pederson Letter")
17. Letter from Michael Akerbergs of URS to Joshua Gradwohl of NJDEP (August 31, 2005) (the "2005 Akerbergs Letter")
18. Letter from Joshua Gradwohl of NJDEP to Robert Medler of Grace (May 9, 2006) (the "5/9/06 Gradwohl Letter")
19. E-mail from Jay Nickerson, Site Remediation Program, NJDEP, to Cathy Bryant and Michael Ackerbergs of URS Corporation (April 30, 2010) ("4/30/10 Nickerson E-Mail")
20. Letter from Robert J. Medler of Grace to Jay Nickerson, Site Remediation Program, NJDEP (June 15, 2010)
21. E-mail from Jay Nickerson to Debbie Parker of Grace (June 22, 2010) (the "6/22/10 Nickerson E-Mail")
22. Letter from Anthony J. Marchetta, Esq. to John F. Dickinson, Esq. (June 23, 2010)
23. Letter from Michael Akerbergs of URS to Jay Nickerson of NJDEP (June 28, 2010)
24. Letter from Deputy Attorney General John Dickinson to Anthony J. Marchetta, Esq. (July 1, 2010) (the "Dickinson Letter")
25. Letter from Anthony J. Marchetta, Esq. to Deputy Attorney General John Dickinson (August 6, 2010) (the "8/6/10 Marchetta Letter")